

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA )  
 )  
Respondent - Appellee )  
 )  
v. ) Case No. 3:00-cr-92  
 )  
JESUS A. URIBE LONDONO )  
 )  
Defendant - Appellant )

MOTION TO STAY OR SET ASIDE

FINAL ORDER OF FORFEITURE

PENDING APPEAL

Now Comes, Jesus A. Uribe Londono, Defendant - Appellant, hereafter Appellant, pro se, moves this Honorable Court pursuant to Federal Rules of Criminal Procedure, Rule 32.2(d), to stay or set aside the final order of June 2, 2005, forfeiting the Appellant's property pending appeal to the 1st circuit court.

In support thereof:

1. There will be irreparable harm from destruction / disposition of property by government, because of the years it took to accumulate these field notes and business contacts.
2. The government has no interest in the property, as it has no commercial value.
3. In balancing the equities, if the government has any interest

involved, equities favor defendant, as the injury from the lost property will be irreversible if the decision is ultimately reversed on appeal.

4. There is likelihood of reversal by the Court of Appeals.

Dated: 7/13/05

Respectfully submitted,



Jesus A. Uribe Londono

Reg. No. 18870-069

F.M.C. Devens

P.O. Box 879

Ayer, MA 01432

CERTIFICATE OF SERVICE

The Appellant, Jesus A. Uribe Londono, hereby certifies under penalty of perjury, that a true and correct copy of the foregoing Motion to Stay or Set Aside Final Order of Forfeiture Pending Appeal has been sent via F.M.C. Devens Institutional legal mail to the parties listed below, where first-class postage was pre-paid, on July 13, 2005.

1. Maritza Gonzalez de Miranda

Assistant U.S. Attorney

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Hato Rey, PR 00918

By:                     

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